

JOSEPH P. RUSSONIELLO (CABN 44332)
United States Attorney

BRIAN J. STRETCH (CABN 163973)
Chief, Criminal Division

PETER B. AXELROD (CABN 190843)
CHRISTINE Y. WONG (NYBN 3988607)
Assistant United States Attorney

KRISTA TONGRING (NJBN 2739-96)
Trial Attorney, United States Department of Justice

450 Golden Gate Avenue
San Francisco, California 94102
Telephone: (415) 436-7200
Facsimile: (415) 436-7234
Email: peter.axelrod@usdoj.gov
christine.wong@usdoj.gov
krista.tongring3@usdoj.gov

Attorneys for the United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA)	No. 09-0862 MHP
)	
v.)	
)	STIPULATION AND [PROPOSED]
)	PROTECTIVE ORDER
DONALD DANIELS, et al.,)	
)	
Defendants.)	
)	
)	

The United States, through its counsel of record, and defendants Donald Daniels, Martin William Washburn, Tapani Koivunen, Sergei Vladimirovich Shkurkin, and Irina Rebegeneau, by and through their counsel of record, hereby agree and stipulate that the Government will provide discovery on the following conditions:

PROTECTIVE ORDER
[CR 09-862 MHP]

1 1. Protected Material

2 The discovery produced in this matter is deemed Protected Material. Possession of
3 copies of the Protected Material is limited to the defendants, their attorneys of record, and
4 investigators, paralegals, law clerks, translators, interpreters, experts and assistants for the
5 attorneys of record (hereinafter collectively referred to as "members of the defense team").

6 The defendants, their attorneys of record, and members of the defense team acknowledge
7 that providing copies of the Protected Material to other persons is prohibited, and agree not to
8 duplicate or provide copies of the Protected Material to other persons. The defendants, their
9 attorneys of record, and members of the defense team may show Protected Material to witnesses
10 or prospective witnesses in conjunction with their defense of the defendants in this case. The
11 defendants, their attorneys of record, and members of the defense team further acknowledge that
12 they are prohibited from using the Protected Material for any purpose other than defending the
13 defendant in the above-captioned matter. Any violation of these prohibitions constitutes a
14 violation of the Protective Order. Further, the attorneys of record agree that prior to
15 disseminating any copies of the Protected Material to members of the defense team, they will
16 provide a copy of this Protective Order to members of the defense team.

17 2. Contact with Certain Witnesses

18 The defendants agree that all contact with the witnesses Antti Koro, Kimmo Saaristo, and
19 Jussi Knaapi will be subject to the following conditions: (1) any and all contact will be through
20 counsel or an investigator working under the direct control of counsel; (2) defendants will not
21 contact these witnesses directly; and (3) any and all interviews of or other substantive contacts
22 with these witnesses will be conducted only upon the express consent of the witness.

23 3. Nontermination

24 The provisions of this Order shall not terminate at the conclusion of this prosecution but
25 only upon further order of this Court. Within 30 days of sentencing or the conclusion of any
26 direct appeal, the defendants' attorneys of record shall return all copies of any Protected Material

(including all copies provided to the defendants, their attorneys of record, and members of the defense team) to the United States Attorney's Office for the Northern District of California.

SO STIPULATED.

DATED: November 19, 2009

/s/ Christine Y. Wong
PETER B. AXELROD
CHRISTINE Y. WONG
Assistant United States Attorneys

KRISTA TONGRING
Trial Attorney

DATED: November 19, 2009

/s/
MARY MCNAMARA, ESQ.
Attorney for DONALD DANIELS

DATED: November 19, 2009

/s/
NANCI CLARENCE, ESQ.
Attorney for MARTIN WILLIAM
WASHBURN

DATED: November 19, 2009

/s/
ANTHONY BRASS, ESQ.
Attorney for DONALD DANIELS

DATED: November 19, 2009

/s/
HARRY SINGER, ESQ.
Attorney for TAPANI KOIVUNEN

DATED: November 19, 2009

/s/
WILLIAM J. PORTANOVA, ESQ.
Attorney for SERGEI SHKURKIN

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PROTECTIVE ORDER
[CR 09-862 MHP]



ORDER

IT IS SO ORDERED.

DATED: November __, 2009

HON. MARILYN H. PATEL
United States District Judge

PROTECTIVE ORDER
[CR 09-862 MHP]